

EXHIBIT 4

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4
5 CISCO SYSTEMS, INC.,
6 Plaintiff,
7 vs. No. 5:14-cv-05344-BLF(PSG)
8 ARISTA NETWORKS, INC.,
9 Defendant.
10 /

11 CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER
12
13

14 VIDEOTAPED DEPOSITION OF TONG LIU
15 FRIDAY, JANUARY 15, 2016
16 PALO ALTO, CALIFORNIA
17
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19
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21 Reported by:
22 ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR
23 CSR LICENSE NO. 9830
24 JOB NO. 2211574
25 Pages 1 - 215

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Videotaped Deposition of Tong Liu, taken on Friday, January 15, 2016, pursuant to notice, on behalf of the Defendants, at 610 Page Mill Road, Palo Alto, California before me, ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~ CSR License No. 9830

1 way.

2 If there are any objections to proceeding,
3 please state them at the time of your appearance.

4 And if you would please state your
5 appearances.

6 MR. WONG: Ryan Wong from Keker & Van Nest
7 for defendant Arista Networks.

8 MR. PAK: Sean Pak of Quinn Emanuel,
9 representing Cisco and the witness.

10 THE VIDEOGRAPHER: Thank you.

11 If the court reporter would please swear the
12 witness, we can begin.

13

14 TONG LIU,

15 having been sworn as a witness
16 by the Certified Shorthand Reporter,
17 testified as follows:

18

19 EXAMINATION

20 BY MR. WONG:

21 Q Good morning, Ms. Liu.

22 A Good morning.

23 Q Please state your full name for the record.

24 A Tong Liu.

25 Q Do you go by any other names, Ms. Liu?

1 Cisco, that other vendors used Cisco-like or iOS-like
2 command line interfaces?

3 MR. PAK: Objection; hearsay; incomplete
4 hypothetical; calls for speculation.

5 THE WITNESS: I don't recall the times that's
6 being referred.

7 MR. WONG: Okay.

8 Q Are you familiar with Arista's networking
9 products?

10 A No.

11 Q Okay. Have you ever been familiar with
12 Arista's networking products?

13 A No.

14 Q Okay. Do you believe that no other vendor
15 other than Cisco can use the command "PTP priority 1"?

16 MR. PAK: Objection; calls for legal
17 speculation and legal analysis.

18 THE WITNESS: Do you mean --

19 MR. PAK: Expert testimony.

20 THE WITNESS: -- using exactly the same word?

21 MR. WONG: Yes.

22 THE WITNESS: I don't know the legal part
23 of --

24 MR. WONG: I'm not asking you as a lawyer.

25 Q I'm just asking you as you: Do you think

1 that other vendors other than Cisco should be barred
2 from using a command like "PTP priority 1"?

3 MR. PAK: Objection; calls for opinion
4 testimony; legal analysis.

5 THE WITNESS: I only know that we came up
6 with the command. Whether the exact same command in
7 the same form should be used is the question; is it?

8 MR. WONG: Yes.

9 Q Just those two words, whether the -- whether
10 those two words can be used by another vendor as a
11 command.

12 MR. PAK: Objection; incomplete hypothetical;
13 calls for opinion testimony; calls for expert
14 testimony and legal analysis.

15 THE WITNESS: I think there could be many
16 different forms of -- configure the same attribute of
17 the clock without using exactly the same word. That's
18 my opinion.

19 MR. WONG: Sure, and I understand that
20 answer.

21 Q But my question was: Do you think that
22 another vendor should not be able to use the two words
23 "PTP priority 1" in order to set the priority 1
24 standardized attribute defined in the PTP IEEE
25 standard?

1 MR. PAK: Same objections; incomplete
2 hypothetical; calls for opinion testimony; calls for
3 expert analysis and legal opinion.

4 THE WITNESS: I'm not an expert on this to
5 comment.

6 MR. WONG: Q. I'm just asking for your
7 personal opinion, Ms. Liu.

8 MR. PAK: Same objections.

9 THE WITNESS: I believe there could be
10 different ways of doing the -- achieving the same goal
11 without using exactly the same command.

12 MR. WONG: I understand that that's your
13 view.

14 Q My question was: Do you think that another
15 vendor, other than Cisco, should not be able to use
16 the command "PTP priority 1" in order to set an
17 industry standard attribute called priority 1 as
18 defined in the PTP IEEE standard?

19 MR. PAK: Object -- objection; argumentative;
20 asked and answered; calls for --

21 MR. WONG: It hasn't been answered.

22 MR. PAK: Calls for a legal opinion and
23 expert testimony; asked and answered.

24 THE WITNESS: In my opinion, there could be
25 different ways.

1 MR. WONG: Okay.

2 Q So you're not -- you're not going to directly
3 answer my question?

4 MR. PAK: Argumentative.

5 Let's move on, Counsel.

6 MR. WONG: Q. The question is still pending.

7 A Right.

8 I do believe --

9 MR. PAK: Same -- same objections.

10 THE WITNESS: -- there are -- there are
11 multiple ways of achieving the same goal. It doesn't
12 have to be exactly the same.

13 MR. WONG: Q. Did you have that belief back
14 in 2008?

15 A Yes.

16 We -- we did config -- we did consider
17 multiple options when we came up with -- before we
18 finalize on the commands.

19 Q Did you ever file any intellectual property
20 rights disclosures with the IEEE regarding the CLI
21 commands that you added to Cisco's devices in 2008
22 relating to PTP?

23 MR. PAK: Objection; calls for speculation.

24 THE WITNESS: I didn't file any claims.

25 MR. WONG: Q. Are you aware of anyone at

1 Cisco filing any intellectual property rights claims
2 with the IEEE relating to the PTP CLI commands that
3 were added in 2008?

4 MR. PAK: Same -- same objections; calls for
5 speculation.

6 THE WITNESS: I myself do not know.

7 MR. WONG: Okay. All right.

8 Well, subject to any questions from your
9 counsel, I have no further questions for you at this
10 time.

11 MR. PAK: I do have some questions, so why
12 don't we switch?

13 THE VIDEOGRAPHER: Do you want to stay on?

14 MR. PAK: Yeah.

15 THE VIDEOGRAPHER: Okay. There's a couple of
16 them over there. There's one there and one there.
17 Stereo. Whatever works for you.

18

19 EXAMINATION

20 BY MR. PAK:

21 Q Good afternoon, Ms. Liu.

22 A Good afternoon.

23 Q Again, for the record, this is Sean Pak of
24 Quinn Emanuel.

25 Ms. Liu, before we follow up on some of the

1 topics that were discussed during your examination,
2 can you tell us whether you're being compensated for
3 your time working on this case or providing these
4 depositions?

5 A No, I was not.

6 Q So you're not receiving any kind of monetary
7 compensation for your involvement in this case through
8 the subpoena; is that correct?

9 A (Witness nods head.)

10 Q Okay. And again, can you verbally indicate
11 the answer.

12 A No, I didn't.

13 Q Okay. And Ms. Liu, do you have any stake in
14 the outcome of this case whatsoever?

15 A No.

16 Q Okay. Ms. Liu, I want to go back to some of
17 the topics that were covered in your examination.

18 Early on in the day, when you were being
19 asked questions by counsel from Arista, one of the
20 things you said was that you had come up with the CLI
21 commands separately from the industry standard.

22 Do you recall that testimony?

23 MR. WONG: Objection; misstates prior
24 testimony.

25 THE WITNESS: Yes.

1 MR. PAK: Okay.

2 Q Can you explain what you meant when you said
3 the CLI commands -- that you had come up with the CLI
4 commands separately.

5 MR. WONG: Objection; misstates prior
6 testimony.

7 THE WITNESS: So I think by "separately," I
8 mean the implementation of the protocol and state
9 machine is one part. And after that's all done, we
10 came up with the CLI commands.

11 MR. PAK: Q. And you were shown this IEEE
12 standard document, Exhibit No. 94.

13 Do you recall that?

14 A 94. I'm trying to see which one is 94.

15 Q It should be this one here.

16 Oh, actually -- sorry.

17 MR. WONG: That's right. Oh, I don't know
18 which one.

19 MR. PAK: No, no. Sorry. I believe we --
20 you had marked that as --

21 MR. WONG: If you're talking about the big
22 one, it's 93, which is the standard.

23 MR. PAK: Yes.

24 Q So, if you'd look at Exhibit No. 93.

25 A (Witness complies.) Yes.

1 Q Do you recall that counsel for Arista showed
2 you this exhibit, which is an IEEE standard for the
3 precision clock --

4 A Yes.

5 Q -- synchronization protocol?

6 And you testified earlier that you had
7 reviewed this standard document; correct?

8 A Yes.

9 Q Okay. Ms. Liu, do you know -- based on your
10 understanding and review of the document as part of
11 your work for Cisco, do you know whether this standard
12 requires any particular commands to be used for any of
13 the protocols that are specified?

14 A When you say "command," you mean the CLI
15 command?

16 Q Correct.

17 A From my understanding, some of the attributes
18 shall be configurable. But whether it's from the CLI
19 command or some other interface, that's the part which
20 I think is an option.

21 Q And what are some examples -- based on your
22 understanding of the specification, what are some
23 options that a designer like yourself would have in
24 terms of implementing the interface, what the user
25 sees, in terms of the various features specified in

1 the nine -- Exhibit 93 IEEE document?

2 MR. WONG: Objection; vague.

3 THE WITNESS: GUI interface could be one.

4 MR. PAK: Q. When you say "GUI," what do you
5 mean by that?

6 A With, like, a web interface, drop-down
7 manuals. Common line interface could be one, and
8 predefined default. Or, as the spec said, some
9 profiles could be options as well, I think.

10 Q Based on your understanding of the IEEE
11 document, can you comply with the standard by using
12 any one of these interfaces for the particular
13 features that are specified in the IEEE document?

14 MR. WONG: Objection; incomplete
15 hypothetical; vague and ambiguous.

16 THE WITNESS: I would think the same set of
17 attributes and parameters should be able to come from
18 a GUI interface.

19 MR. PAK: Q. You were also asked by counsel
20 some statements from the IEEE document. And there was
21 testimony that you gave which indicated your
22 understanding that for mandatory functionality, there
23 would be no deviation of the behavior.

24 Do you recall that testimony?

25 A Yes.

1 Q Okay. When you said no deviation of the
2 behavior, what did you mean by that?

3 A That the external feature or functionality of
4 the PTP clock should be consistent with the spec. But
5 that doesn't imply the CLI part. I think that's what
6 I want to say. It's the feature part.

7 Q And can you elaborate on that.

8 What do you mean when you say it "doesn't
9 imply the CLI part" in your answer?

10 A So I think the standard describes how the PTP
11 clock functions. And that's -- to me, that's the
12 feature part. That's the functionality of the
13 protocol.

14 As to what are the configurable parameters or
15 attribute of a clock, that was by design and by
16 choice. It's not defined in the -- it's not
17 completely defined in the spec.

18 Q So let's look at some of the specific
19 examples that were given to you. If you'll look at --
20 this is now a separate document, Exhibit No. 92.

21 A Okay.

22 Q Do you see on page 24 of that document the
23 CLI command "PTP priority 1"?

24 A Yes.

25 Q Is it possible to implement the functionality

1 of "PTP priority 1" using a different command than the
2 one that you selected?

3 MR. WONG: Objection; vague and ambiguous.

4 THE WITNESS: I can think of maybe "PTP clock
5 priority 1" or "PTP prior 1." I think there could be
6 different ways of defining the same parameter in a
7 slightly different way.

8 MR. PAK: Q. And, when counsel was asking
9 some questions toward the end, you talked about having
10 the ability to use different types of commands for the
11 same functionality.

12 Do you recall that testimony?

13 A Different types of commands?

14 Q Or different commands, yes.

15 A Different commands, yes.

16 Q Okay. And again, if you're looking at the
17 "PTP priority 2" command, is it possible to have
18 different commands for the functionality of the "PTP
19 priority 2," based on your understanding of the IEEE
20 specification?

21 A Yeah, you could say PTP -- saying "PTP clock
22 priority 2" or "priority-2."

23 Q And then, let's just go through the rest of
24 the commands we discussed during your initial
25 examination.

1 If you'd turn now to -- on page -- actually,
2 on the same page, page '24, "PTP sync interval."

3 Again, are there different ways of expressing
4 the command for that same function of "PTP sync
5 interval"?

6 A Maybe "PTP sync-interval" or "PTP interval
7 sync," as there could be multiple different types of
8 intervals that you can define with PTP clock.

9 Q Let's take that example. If I had "PTP sync
10 interval," which is what you selected, and compare
11 that to "PTP interval sync," based on your experience
12 with CLI commands, would those two commands have the
13 same command hierarchy or a different command
14 hierarchy?

15 A You mean with dash or without dash?

16 Q Without dash.

17 A It's going to be different depending on
18 whether -- so how -- how you look at it; right?

19 If you want to have multiple intervals, then
20 you put interval first, and then you have interval
21 sync, interval something else.

22 I think, at the time we chose this form was
23 because there were other sync parameters than
24 interval. So we did sync, and then under that, you
25 can have subcommands of different options to

1 configure.

2 Q And the safety example of comparing "PTP sync
3 interval" compared to "PTP sync-interval," would those
4 two commands have the same hierarchy or different
5 command hierarchies?

6 A "PTP sync interval" would give you one more
7 level of hierarchy, while "PTP sync-interval" is --
8 this -- this term is on the -- on the same level,
9 right, sync and interval. It's just one keyword. So
10 it's different. It's one more level of hierarchy with
11 a space.

12 Q So, in that example, "PTP sync interval," how
13 many levels would you have in the command hierarchy?

14 A Three.

15 Q And, in the other example of "PTP
16 sync-interval," how many levels would you have in the
17 command hierarchy?

18 A Two.

19 Q Another topic that was discussed during your
20 examination was PlugFest.

21 Do you recall that?

22 A Yes.

23 Q Okay. When you were talking about
24 interoperability of vendor products for PlugFest, what
25 did you mean by that?

1 A It's the -- when the vendors support PTP v2
2 clock, when their devices are connected together, they
3 should be able to sync to the same master clock or
4 grand master clock, and they would be able to
5 calculate, based on the PTP algorithm, to sync the
6 time, calculate delays, and all of those.

7 So these are the behavior -- behavior-wise,
8 they should all comply to the standard -- PTP
9 standard.

10 Q Based on your understanding of PlugFest and
11 the PTP IEEE standard, can you have the type of
12 behavioral interoperability that you talked about
13 while having different types of command interfaces for
14 the different vendor products?

15 MR. WONG: Objection; calls for expert
16 testimony.

17 THE WITNESS: Yes. How you achieve the
18 configuration of the clock could be very different.
19 The interoperability is on the -- on the behavior, on
20 the features, not on how you configure the -- the
21 device. That's my understanding.

22 MR. PAK: Q. So, would your Cisco product
23 that used your CLI interface for the PTP commands,
24 would -- would that product be interoperable in a
25 PlugFest environment with a Siemens product that used

1 a GUI interface -- a G-U-I interface -- for PTP?

2 MR. WONG: Objection; incomplete
3 hypothetical; foundation.

4 THE WITNESS: Okay. It would be. It doesn't
5 matter how you configure or reach this state; right?
6 It's the -- it's the clock behavior, the device, that
7 are interoperable.

8 MR. PAK: Okay.

9 Q And, just to be clear on the record about
10 your experience in this regard, you worked on the PTP
11 implementation for Cisco; correct?

12 A Yes.

13 Q You also read the IEEE PTP specification as
14 part of your work for Cisco; correct?

15 A Yes.

16 Q And your implementation that -- for the PTP
17 protocol for Cisco was then, to your knowledge, used
18 at PlugFest?

19 A Yes.

20 Q And, in doing that, you understood generally
21 what the requirements of PlugFest interoperability
22 are; correct?

23 A Yes.

24 MR. WONG: Objection; leading.

25 MR. PAK: Okay.

1 Q And what is your understanding of the
2 requirements of PlugFest interoperability?

3 A I don't recall all of the requirement.

4 Our focus at the time was on the clock side
5 that Cisco's device can -- can be selected as master
6 clock, and it can sync to master clock if some other
7 vendor's device were selected as master clock. So
8 it's on the -- on the timing and on the clock behavior
9 part.

10 Q So why don't you pull out Exhibit No. 93,
11 which is, again, the IEEE standard for the precision
12 clock synchronization protocol.

13 A (Witness complies.) Okay.

14 Q Do you recall that counsel showed you some
15 pages from this document?

16 A Yes.

17 Q Okay. I'm going to show you some additional
18 pages that relate to the questions that he asked.

19 A Okay.

20 Q So, if you'll look at page 123 of Exhibit
21 No. 93.

22 A 123. (Witness complies.) Okay.

23 Q Do you see that there is a section --
24 actually, preceding that on page 122, there's a
25 section titled:

1 "Synchronization and Syntonization of
2 Clocks."

3 Do you see that?

4 A Yes, uh-huh.

5 Q And just to be clear, what is syntonization,
6 T-O-N-I-Z-A-T-I-O-N, if you recall?

7 A I don't recall.

8 May I just read --

9 Q Sure.

10 A -- the part to refresh my memory?

11 (Witness reading document.)

12 If I remember -- now I'm trying to recall
13 from memory -- synchronize is synchronize on the
14 clock. Syntonization is not only to synchronize on
15 the time, but also on the frequency.

16 Q Thank you.

17 And under that section 12, if you'd turn to
18 the next page, page 123.

19 A (Witness complies.)

20 Q In the middle of that page, you'll see a
21 reference to a "NOTE."

22 Do you see that?

23 It says NOTE in caps.

24 A NOTE. Oh, yes.

25 Q And then under NOTE, it says "as one

1 example."

2 Do you see that sentence?

3 A Yes.

4 Q And, if you read that sentence, at the end,
5 it says:

6 "The master clock between a received time
7 stamp and a second received time stamp some number of
8 syncINTERVAL."

9 Do you see that?

10 A Uh-huh, yes.

11 Q And what is your understanding of that word
12 "syncINTERVAL," one word, based on your understanding
13 of the specification?

14 A So, this syncINTERVAL would be what is one of
15 the attribute of the clock which user chose to
16 configure. So once that's configured, it's used in
17 the calculation of the -- this entire thing.

18 Q Okay. So if we'd go to Exhibit No. 92, which
19 has your particular CLI commands.

20 A Right.

21 Q In the middle of that page, we have the
22 command "PTP sync interval."

23 Do you see that?

24 A Which come before; right?

25 (Witness complies.) Yes, I found it.

1 Q So, looking at the expression that you chose,
2 sync, S-Y-N-C, space, interval, comparing it to sync,
3 S-Y-N-C, capital I-N-T-E-R-V-A-L, one word, in the
4 IEEE standard, are those expressions the same
5 expression, or are they two different expressions of
6 the same concept?

7 MR. WONG: Objection; calls for expert
8 testimony.

9 THE WITNESS: They are two different
10 expressions to mean the same concept.

11 MR. PAK: Q. And if you had taken the
12 syncINTERVAL, one word, from the IEEE specification
13 and used that in your PTP command, so it would read
14 "PTP syncINTERVAL," one word, would that result in the
15 same command hierarchy or different command hierarchy
16 as the "PTP sync interval" command that you chose?

17 A It would be one less level of command
18 hierarchy.

19 Q So would they be the same hierarchy or
20 different?

21 A It would be different.

22 Q Let's turn now to a different page in the
23 IEEE standard. Turn to page 138 in Exhibit 93.

24 A (Witness complies.) Okay.

25 Q Do you see that there's a Table 38, and it

1 says:

2 "Values of Action Field."

3 A Yes.

4 Q And then, if you'd turn to the page before.

5 A (Witness complies.)

6 Q It's part of this 15.4 section called:

7 "Management Message Format."

8 Do you see that?

9 A Yes.

10 Q Generally speaking, what is this part of the
11 specification describing when it says management
12 message format?

13 A The management messages are the messages
14 exchanged between the different clocks. And the
15 section would define what fields the -- are in the
16 message and how wide the field is and arranged and
17 everything.

18 Q And are these management messages, that are
19 described here, the same as or different than the CLI
20 commands that the user would see on a switch?

21 MR. WONG: Objection; calls for opinion
22 testimony.

23 THE WITNESS: Can you clarify "message" --

24 MR. PAK: Oh, sure.

25 THE WITNESS: -- and that part of the

1 question.

2 MR. PAK: Q. Would these management -- let
3 me step back.

4 Would these management messages that are
5 described in the specification -- are these messages
6 that would be shown to the user of the -- of the
7 network?

8 A They --

9 MR. WONG: Objection; vague.

10 THE WITNESS: -- would be.

11 MR. PAK: Okay.

12 Q So these are messages that are communicated
13 between the devices?

14 A Yes.

15 Q Okay. And so -- but, if you look at this
16 "Action" field, do you see the action "GET" as the
17 first entry?

18 A Yes.

19 Q And why don't you take a few seconds to read
20 the action taken for the value GET, G-E-T, capital G,
21 capital E, capital T.

22 A Okay. (Witness reading document.) Okay.

23 Q It says here that:

24 "The management message shall carry a single
25 management TLV. The management ID field of the TLV

1 indicates the specific information that needs to be
2 retrieved."

3 Do you see that?

4 A Yes.

5 Q So the GET message, when it's implemented
6 upon receipt by a device, what would -- what --
7 generally speaking, what is the action that would be
8 undertaken by the device?

9 A It will go and retrieve some information and
10 return it.

11 Q Okay. And then, if you read the next row
12 entry, "SET," capital S, capital E, capital T, please
13 take a look at the "Action Taken" description, and let
14 me know when you're finished.

15 A Okay. (Witness reading document.)

16 Okay. I'm done.

17 Q Okay. So here for SET, the entry reads:

18 "The management message shall carry a single
19 management TLV. The data in the TLV shall be used to
20 update the current value of the data identified by the
21 management ID field."

22 Do you see that?

23 A Uh-huh, yes.

24 Q So, generally speaking, what would the device
25 do upon receiving a SET message?

1 A It would take the value from the message and
2 change its current value to the new value.

3 Q And, if you'd turn to the next two pages
4 after this, so page 140.

5 A (Witness complies.)

6 Q There's a Table 40, and it has a list of
7 management ID values.

8 Do you see that?

9 A Yes.

10 Q And, if you look under the middle section,
11 "Applicable to Ordinary and Boundary Clocks," do you
12 see a reference to "PRIORITY 1" in all caps?

13 A Yes.

14 Q And, if you follow that across, there's a
15 management ID value "2005."

16 Do you see that?

17 A Yes.

18 Q And what's your understanding of that
19 management ID value 2005 as it relates to priority 1?

20 A In the message, if I see the value 2005 in
21 the management ID field of the message, I would take
22 the value as the value for priority 1.

23 Q Okay. And is that 2005 expression for
24 priority 1 the same as or different than what you
25 selected for the PTP command "PTP priority 1"?

1 MR. WONG: Objection; vague.

2 THE WITNESS: The meaning would be the same.

3 It will be referring to the same attribute of the
4 clock.

5 MR. PAK: Q. But you didn't use the letters
6 or the number 2005 in your command; correct?

7 A No.

8 Q Okay. And do you see that after 2005, it
9 says there are allowed actions GET and SET?

10 A Yes.

11 Q Okay. And so those are the same GET and SET
12 commands that we saw before; correct?

13 A Yes.

14 Q Now, in your command, to set the priority 1
15 value for PTP, you didn't use the word SET; did you?

16 A No, I didn't.

17 Q Even though the word SET appears in the
18 specification from the IEEE for priority 1; correct?

19 A That's right.

20 Q Okay. And similarly, when we look at your
21 command for "PTP priority 2," you see in Table 40 on
22 page 140 of the IEEE, the priority 2 is given the
23 management ID value 2006; correct?

24 A Yes.

25 Q But you didn't use 2006 to represent

1 priority 2 in your "PTP priority 2" command; correct?

2 A No.

3 Q And, although it says the allowed actions for
4 that priority 2 are GET and SET, you didn't use the
5 command SET to set the value for priority 2 in the
6 Cisco CLI; correct?

7 A No, I didn't.

8 Q Okay. And if you see below that, you also
9 see there's something called "log_sync_interval"?

10 A Yes.

11 Q And that also has the GET and SET --

12 A Yes.

13 Q -- command actions?

14 And then, if you go to -- going back to your
15 page -- or deposition Exhibit No. 92, and just tell
16 me -- if you'd flip forward to show commands. This is
17 page 36.

18 A (Witness complies.)

19 Q You authored the command "show PTP clock";
20 correct?

21 A Yes.

22 Q Now, although the specification from the IEEE
23 used the command or message GET, you didn't use GET in
24 your command "show PTP clock"; did you?

25 MR. WONG: Objection; mischaracterizes the

1 document.

2 MR. PAK: Let me rephrase.

3 Q Although the specification indicates that one
4 of the allowed actions for management values is GET,
5 G-E-T, Ms. Liu, you did not use the word GET in
6 authoring the command "show PTP clock"; correct?

7 MR. WONG: Same objection.

8 THE WITNESS: I didn't use GET --

9 MR. PAK: Q. You used the word --

10 A -- in my --

11 Q You used the word show?

12 A I used show.

13 Q Right.

14 Similarly, you didn't use the word GET from
15 the IEEE standard when you were authoring the term or
16 command "show PTP parent"; is that correct?

17 A That's correct.

18 Q And on that last point, "show PTP parent,"
19 counsel showed you instances in the specification,
20 where the IEEE standard uses the word "parent" as an
21 acronym or shorthand for "parent clock"; correct?

22 A Yes.

23 Q But you also saw in the specification places
24 where the specification used the whole phrase parent
25 clock; correct?